

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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**OLUTOKUNBO EFUNNUGA,**

**Plaintiff,**

**v.**

**STEVEN FARLEY, et al.,**

**Defendants**

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: **CIVIL ACTION**  
: **No. 2:18-cv-0924**  
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**PAGES 52-53 FROM DESPOSITION OF PLAINTIFF  
OLUTOKUNBO EFFUNUGA**

Pursuant to the oral request of the Court on March 7, 2023, please find attached pages 52 and 53 of Plaintiff Olutokunbo Effunuga's August 12, 2023 deposition, as cited on page 31 of Defendants' Memorandum in Support of their Motion for Summary Judgment.

Date: March 7, 2023

Respectfully submitted,

/s/ Zachary Strassburger

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1 public.

2 Q. Tell me about the basement?

3 A. On May 5th I'm replacing the hot water  
4 heater and I look up and Officer Farley is standing  
5 on top of me. I didn't call him at that time. I  
6 didn't expect him to be there. It was a total  
7 shock. It blew my mind. He said something. He  
8 said stand up. I stood up. I'm like what's going  
9 on. I immediately inquired what's going on. I  
10 don't know the exact words.

11 He said stand up. We have to search  
12 you or something along that. I said what for. I  
13 kind of backed up. The other officer that was with  
14 him, I remember maybe not grabbing my shoulder but  
15 placing his hand on my shoulder. Officer Farley  
16 searched me.

17 I asked them multiple times what was  
18 going on. He asked me what I was doing there. I  
19 told him in choice words I was doing whatever I  
20 wanted to do there. He said something that I didn't  
21 like and I started losing my cool. The other  
22 officer kind of let his presence known.

23 At this point we were in the third --  
24 we were in the rear part of the basement, which  
25 houses the hot water heaters, so I was on the ground

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1 by the hot water heater. He ended up kneeling down,  
2 shining his light at the hot water heater and the  
3 work I was doing in the plumbing area.

4 I do remember saying something about  
5 don't we have enough trouble or something like that.  
6 And after that we had a little exchange, but I don't  
7 recall exactly what happened, but we ended up  
8 walking towards the door, which is in the first part  
9 of the basement and they leave.

10 I walked back into the basement,  
11 because I was kind of blown away. And I didn't hear  
12 anybody outside for a couple of minutes. I got on  
13 the phone -- oh, I walked back in the basement  
14 because I received a phone call, a friend of mine  
15 drove by and he had asked me if I was all right.

16 I don't think that was just a  
17 coincidence but by the time I came back out I seen  
18 the police car in front but I didn't approach it.

19 Q. Did you ever find out why they came?

20 A. Yes. I learned during discovery in the  
21 case.

22 Q. What was the reason that was given?

23 A. A call for a theft in progress or a  
24 burglary in progress, something like that.

25 Q. How many times have you interacted with

### **CERTIFICATE OF SERVICE**

I hereby certify that on the date below, the Defendants’ “Pages 52-53 from Deposition” was filed via the Court’s electronic filing system and is available for downloading.

Date: March 7, 2023

Respectfully submitted,

/s/ Zachary Strassburger  
Zachary Strassburger